

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

GRAHAM - FIELD, INC., et al

Plaintiffs

Vs

E1 Enterprises, Inc., et. al.

Defendant

CIVIL NO. 98-1306 (DRD)
CIVIL ACTION

**MOTION TO RECONSIDER E1'S REQUEST FOR LEAVE TO REPLY TO
PLAINTIFF'S OPPOSITION TO OUR MOTION FOR SUMMARY JUDGMENT**

TO THE HONORABLE COURT:

COMES NOW defendant E1 ENTERPRISES, INC., D/B/A TUFFCARE, represented by the undersigned attorney, and most respectfully STATES, ALLEGES and PRAYS:

Plaintiffs filed the following motions (Docket No. 230) in opposition to E1's motion for summary Judgment (Docket No. 202) ("Opposition"):

1. *Plaintiffs Memorandum in Opposition to Defendant's Motion for Summary Judgment - Robinson Patman and in Support of Plaintiffs' Counter Motion for Summary Judgment.*
2. *Plaintiffs' Rule 311.12 Statement of Disputed Facts.*
3. *Plaintiffs' Memorandum in Opposition to Defendant's Motion for Summary Judgment - Law 75.*

E1 sought leave from the Court to reply. (Docket 237.) The Court denied E1's request. (Docket 243.) E1 hereby requests reconsideration within the 10 days granted by Fed. R. Civ. P. 59(e).

Graham Field, Inc. v. E1 Enterprises, Inc., 98-1306
(DRD)

Motion to Reconsider

Plaintiffs make confusing arguments and unwarranted attacks in their Opposition. None of which should go unanswered. All arguments brought forth by plaintiffs only serve to cloud the issues. They do not raise issues worthy of trial. In its reply E1 addresses each issue and clears up all attempts at confusion.

E1 understands that it is taxing the reader's patience, however, it may avoid an unnecessary trial.

E1 is attaching its reply as an exhibit to this motion.

WHEREFORE, we respectfully pray from this Honorable Court to GRANT this motion and, accordingly, allow E1 to file a reply to Plaintiffs' opposition to defendant's Motion for Summary Judgment (Docket 202).

I HEREBY CERTIFY that, on this same date, a true copy of this document has been sent via electronic mail to Mr. Kenneth J. Mc Culloch, BRG&S, 909 Third Avenue, 18th Floor, New York, New York 10022.

RESPECTFULLY SUBMITTED.

Hato Rey, Puerto Rico, March 4, 2004.

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